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Jessica Sandler <jessicas@peta.org> on 07/30/2002 12:38:36 PM



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To: NCIC OPPT/DC/USEPA/US@EPA, ChemRTK HPV/DC/USEPA/US@EPA, Rtk  
Chem/DC/USEPA/US@EPA, Karen Boswell/DC/USEPA/US@EPA, HELEN\_HATCH@fmc.com

cc:

Subject: Public comments

Attached please find the comments of the American animal protection community on FMC's HPV test plan.

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People for the Ethical Treatment of Animals  
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- HPV test plan comments -- Butyllithium.pdf

July 29, 2002

Christine Todd Whitman, Administrator  
U. S. Environmental Protection Agency  
Ariel Rios Building  
Room 3000, #1101-A  
1200 Pennsylvania Ave., N. W.  
Washington, DC 20460

Subject: Comments on the FMC Corporation's Test Plan for Butyllithium

Dear Administrator Whitman:

The following comments on the FMC's test plan for the individual chemical butyllithium are submitted on behalf of People for the Ethical Treatment of Animals, the Physicians Committee for Responsible Medicine, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

We commend the FMC's submission on butyllithium, a highly reactive, flammable material used as an initiator for polymerization in the production of automobile tires. FMC provides a thoughtful, well-reasoned justification for not subjecting any additional animals to toxicity testing with butyllithium.

As discussed in the FMC test plan, butyllithium instantly ignites in moist air. Due to this distinctive property, butyllithium is stored and handled in closed systems. It is not present in commercial products. Exposure to humans or the ambient environment is highly unlikely. Decomposed solutions of butyllithium are corrosive and flammable.

Exposing animals to this dangerous substance would be horrifyingly inhumane. Compliance with OECD testing protocol would be nearly impossible and would only produce irrelevant information. Moreover, additional testing on animals would not expand the public health understanding of butyllithium or change the way it is handled. FMC tightly controls the use, storage, and transport of this material. Therefore, FMC's proposal is fully in keeping with the requirement stated in the October 1999 agreement and reiterated in the December 2000 *Federal Register* notice that "participants shall conduct a thoughtful, qualitative analysis...Participants may conclude that there is sufficient data, given the totality of what is known about a chemical, that certain endpoints need not be tested." And that "before generating new information, participants should consider whether any additional information obtained would be useful or relevant." We therefore support the FMC's contention that no additional animal tests on this substance can possibly be justified.



**PETA**

PEOPLE FOR THE ETHICAL  
TREATMENT OF ANIMALS

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AN INTERNATIONAL  
ORGANIZATION DEDICATED  
TO PROTECTING  
THE RIGHTS OF ALL ANIMALS

Thank you for your attention to these comments. I can be reached at 757-622-7382, ext.1304, or via e-mail at [\*jessicas@peta.org\*](mailto:jessicas@peta.org).

Sincerely,

Jessica Sandler, MHS  
Federal Agency Liaison